

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
TYRONE B. SAMUELS a/k/a SAMUELS)	MAGISTRATE GENERAL
TYRONE BARR a/k/a TYRONE SAMUELS)	
a/k/a SAMUELS, TYRONE, B.,)	
)	
Defendant.		

COMPLAINT

The United States, by Gary S. Shapiro, Acting United States Attorney for the Northern District of Illinois, brings this action against the defendant, TYRONE B. SAMUELS a/k/a SAMUELS TYRONE BARR a/k/a TYRONE SAMUELS a/k/a SAMUELS, TYRONE, B., and for its cause of action states:

COUNT I

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1345 and 7 U.S.C. § 2021(f).

2. The defendant, TYRONE B. SAMUELS a/k/a SAMUELS TYRONE BARR a/k/a TYRONE SAMUELS a/k/a SAMUELS, TYRONE, B., resides within the jurisdiction of this Court.

3. Pursuant to the provisions of Title IV-B of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1071 - 1087-2, and regulations promulgated thereunder 34 C.F.R. Part 682, the defendant executed promissory notes as more fully set forth in the Certificate of Indebtedness attached hereto as Exhibits "A" and "B", respectively.

4. Although demand has been made for payment, there remains due and owing the principal sum of \$614.02, and interest to November 2, 2012 in the sum of \$508.13 at 3.000% per annum.

COUNT II

1. Paragraphs 1 through 2 are realleged and hereby made Paragraphs 1 through 2 on Count II.

2. Pursuant to the provisions of Title IV-B of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1071 - 1087-2, and regulations promulgated thereunder 34 C.F.R. Part 682, the defendant executed promissory notes as more fully set forth in the Certificate of Indebtedness attached hereto as Exhibits "C" and "D", respectively.

3. Although demand has been made for payment, there remains due and owing the principal sum of \$1,514.67 and interest to November 2, 2012, in the sum of \$3,706.24 at 9.000% per annum.

WHEREFORE, the United States demands judgment against the defendant as follows:

- a. in the amount of \$1,122.15 (\$614.02 principal and \$508.13 interest accrued through November 2, 2012) in Count I;
- b. interest to continue to accrue at the rate of 3.000% per annum until the date of Judgment in Count I;
- c. in the amount of \$5,220.91 (\$1,514.67 principal and \$3,706.24 interest accrued through November 2, 2012) on Count II;
- d. interest to continue to accrue at the rate of 9.000% per annum until the date of Judgment in Count II;
- e. interest from the date of judgment at the statutory rate until paid in full;

- f. costs of suit; including but not limited to, filing fee of \$150.00, as authorized by 8 U.S.C. §2412(a)(2); and
- g. for such other proper relief as this court may deem just.

Respectfully submitted,

GARY S. SHPAIRO
Acting United States Attorney

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